

SBC Illinois Performance Measure Failures

Docket No. 01-0662
ICC Staff Exhibit 40.0
Schedule 40.05
Page 1 of 8

Checklist Item	Staff Exhibit	Staff Phase II Conclusions	Staff Recommendations
Item 2 Access to Network Elements - OSS	Staff Exhibits: 41.0 42.0 43.0	SBC Illinois Performance Measurement Results (3 months) The three months of performance measurement data submitted by the company in support of checklist (ii) does not demonstrate that with respect to the ordering or provisioning performance measures SBC Illinois is providing non-discriminatory service to the CLECS.	(1) SBC Illinois should be required to correct the deficiencies associated with the ordering performance measures that apply to check list item (ii) prior to receiving a positive Section 271 recommendation from this Commission. If the Commission decides to provide a conditional recommendation to the FCC, then the company should be required to address its deficiency with these measurements per the timeframe specified in the affidavit of Samuel McClerren. Staff Ex. 41.0.
Item 2 Access to Network Elements - OSS	Staff Exhibit 42.0	SBC's performance measures with respect to billing are generally satisfactory with the exception of PM17 - timeliness. SBC consistently gives its affiliate more timely bills than it gives the CLECs. This has been a persistent problem over the last year and SBC has failed to demonstrate much improvement over that time period. SBCI has not identified	SBC Illinois must identify the steps that it will take to correct its unsatisfactory performance with respect to PM17 - billing timeliness. The company then must implement its plan and demonstrate substantially improved performance six months hence.

SBC Illinois Performance Measure Failures

Docket No. 01-0662
ICC Staff Exhibit 40.0
Schedule 40.05
Page 2 of 8

		any specific steps it will take to improve its performance with respect to PM17.	
Item 4 Unbundled Loops	Staff Exhibit 44.0	Performance Measurement - Checklist Item 4 – Unbundled Local Loops – Stand-Alone DSL Loops: The Company is not meeting FMOD process benchmarks measured by submeasure C WI 6 – 02.	Checklist Item 4 – Unbundled Local Loops – Stand-Alone DSL Loops: As a prerequisite to a positive consultation with the FCC regarding whether the Company is provisioning its stand-alone DSL loops in accordance with the requirements of Section 271(c)(2)(B)(iv), Staff recommends that the Company take corrective action to ensure that FMOD Form A notifications related to stand-alone DSL orders are sent in a timely manner. The Company should in its surrebuttal affidavits: (1) thoroughly and completely explain why the PM C WI 6 – 02 measurements submitted in Attachments A and B to Mr. Ehr's initial affidavit were improperly calculated, (2) thoroughly and completely explain how the Company's revised calculation methodology corrects the problem and more accurately comports with the

SBC Illinois Performance Measure Failures

Docket No. 01-0662
ICC Staff Exhibit 40.0
Schedule 40.05
Page 3 of 8

			<p>Company's business rules, (3) provide recalculated September, October, and November 2002 performance data to demonstrate that recalculated C WI 6 – 02 PMs demonstrate that the Company is meeting the 24 business hour benchmark for this measure. If the Company complies with this request, Staff will revise its recommendation accordingly. If the Company cannot or chooses not to comply with these requirements then Staff will recommend that the Commission decline to provide the Company a positive consultation with the FCC.</p>
Item 4 Unbundled Loops	Staff Exhibit 44.0	<p>Performance Measurement - Checklist Item 4 – Unbundled Local Loops – DSL Loops With Linesharing: Installation quality and repair and maintenance of installed DSL loops with linesharing is not provided at parity as indicated by the fact that the Company is not meeting parity criteria with respect to submeasures 59-03, 65-03, 65.1-03, 67-03, 67-18, and</p>	<p>Checklist Item 4 – Unbundled Local Loops –DSL Loops With Linesharing: As a prerequisite to a positive consultation with the FCC regarding whether the Company is provisioning its DSL loops with linesharing in accordance with the requirements of Section 271(c)(2)(B)(iv), Staff recommends that the Company take corrective action to ensure that it is providing loop quality</p>

SBC Illinois Performance Measure Failures

Docket No. 01-0662
ICC Staff Exhibit 40.0
Schedule 40.05
Page 4 of 8

		<p>66-03. In his rebuttal affidavit Mr. Ehr does not dispute that submeasures 59-03, 65-03, 65.1-03, 67-03, 67-18, and 66-03 did not meet parity standards. While the Company has taken steps to address these problems, the Company does not explain how the steps the Company has taken to correct the problems will result in improved performance.</p>	<p>and maintenance and repair of DSL loops with linesharing at parity. The Company should in its surrebuttal affidavits: (1) thoroughly and completely explain why it failed parity criteria for submeasures 59-03, 65-03, 65.1-03, 67-03, 67-18, and 66-03, (2) thoroughly and completely explain how the steps the Company has taken to address maintenance and repair performance will result in the Company meeting the applicable parity standards, (3) provide a detailed timetable for implementation of its remedial actions, and (4) commit to reporting to the Commission on the progress it has made in meeting parity standards until such time as the Company demonstrates that it has corrected the problems identified above.</p>
		<p>Performance Measurement- Checklist Item 4 – Unbundled Local Loops – Unbundled Voice Grade Loops: The PM data submitted by the Company indicates that the Company is</p>	<p>Checklist Item 4 – Unbundled Local Loops – Unbundled Voice Grade Loops: As a prerequisite to a positive consultation with the FCC regarding whether the Company is provisioning it's voice grade loops in</p>

SBC Illinois Performance Measure Failures

Docket No. 01-0662
ICC Staff Exhibit 40.0
Schedule 40.05
Page 5 of 8

<p style="text-align: center;">Item 4 Unbundled Loops</p>	<p style="text-align: center;">Staff Exhibit 44.0</p>	<p>not always meeting parity criteria for installation timeliness when installing voice grade loops. For the three months ending in November of 2002, the Company failed to meet parity criteria for PMs 55-01.1, 55-01.2, and 55-01.3 three out of the eight times parity criteria were evaluated. As reflected in PMs 56-01.1 and 56-01.2 the Company missed parity criteria for meeting non-standard customer requested due dates one out of the six times parity criteria were evaluated. Recent performance measurement data indicate that the Company's performance problems with respect to measures 55-01.1, 55-01.2, and 55-01.3 have continued.</p>	<p>accordance with the requirements of Section 271(c)(2)(B)(iv), Staff continues to recommend that the Company take corrective action to ensure that it is providing voice grade loops at parity. The Company should in its surrebuttal affidavits: (1) thoroughly and completely explain why it failed parity criteria for submeasures 55-01.1, 55-01.2, and 55-01.3, (2) thoroughly and completely explain what steps the Company will take to ensure that it meets the applicable parity standards, (3) provide a detailed timetable for implementation of its remedial actions, and (4) commit to reporting to the Commission on the progress it has made in meeting parity standards until such time as the Company demonstrates that it has corrected the problems identified above.</p>
<p style="text-align: center;">Item 7 911, E-911, Directory Assistance,</p>	<p style="text-align: center;">Staff Exhibit 48.0</p>	<p>Performance Measurement - Checklist Item 7 Staff believes that SBC Illinois has the ability to meet</p>	<p>Checklist Item 7 If the Commission does not find that SBC Illinois has failed to demonstrate that it is providing</p>

SBC Illinois Performance Measure Failures

Docket No. 01-0662
ICC Staff Exhibit 40.0
Schedule 40.05
Page 6 of 8

and Operator Services		<p>this PM and they have demonstrated this in the past. SBC Illinois has not adequately explained how it is meeting the parity standard for PM 104 and cannot verify that it is providing non-discriminatory access to CLECs. Although meeting the NENA standards (by processing updates to the 9-1-1 database within 24 hours) addresses my public safety concerns, it does not indicate whether SBC Illinois is providing non-discriminatory access to 9-1-1. Therefore, in my opinion, SBC Illinois has failed to demonstrate that it is providing non-discriminatory access to 9-1-1 services.</p>	<p>non-discriminatory access to 9-1-1 services, then I recommend – in the alternative – that the Commission require one of the following as a condition to any determination that SBC Illinois is providing non-discriminatory access to 9-1-1 services:</p> <ol style="list-style-type: none">(1) SBC Illinois should present a reasonable plan to address its failure to consistently update CLEC 9-1-1 database files at the parity standard currently established, and commit to implement that plan in a timely manner; or(2) If the Commission does not find that SBC Illinois should be required to achieve parity under the current performance measure standard for Section 271 purposes, then SBC Illinois should present an alternative standard for the updating of 9-1-1 database files and
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SBC Illinois Performance Measure Failures

Docket No. 01-0662
ICC Staff Exhibit 40.0
Schedule 40.05
Page 7 of 8

			commit to adopt such measure and standard as an additional performance measure and standard pending the next six month collaborative. If the Commission accepts SBC's position that it should not be held to the existing standard, then a reasonable and workable standard is required so that timely updating of 9-1-1 database files on a non-discriminatory basis can be monitored by Staff and the Commission.
Item 14 Resale	Staff Exhibit 41.0	SBC Illinois failed PM 37-1, which reflects service quality to all residential plain old telephone service ("POTS") customers. It is also a PM in which SBC Illinois has successfully met the standard in previous months – specifically, April 2002	The Commission should require the Company to correct the problems it has with trouble reports for CLEC POTS customers. The Company should, in it's rebuttal affidavits, explain why these problems are occurring and demonstrate that proper steps have been taken

SBC Illinois Performance Measure Failures

Docket No. 01-0662
ICC Staff Exhibit 40.0
Schedule 40.05
Page 8 of 8

		through September 2002. Inexplicably, SBC Illinois failed this sub-measure in October and November 2002.	to ensure that these problems are corrected and will not recur on a going forward basis.
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